

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

HEARING DATE: November 12,
2024
HEARING TIME: 10:00 a.m.

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In re: : Chapter 11
4D Factory, Inc., et al. :
Debtors¹. :
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NOTICE OF MOTION TO REMOVE DEBTORS-IN-POSSESSION

PLEASE TAKE NOTICE that upon this Notice of Motion, the Declaration of Lauren Friend McKelvey dated October 9, 2024 and the exhibits annexed thereto, and the accompanying memorandum of law and exhibits annexed thereto, and upon all prior papers and proceedings heretofore had herein, MEP Capital Holdings III, L.P. (“MEP”), a creditor and party in interest in this bankruptcy matter, will move this Court before the Honorable Michael E. Wiles, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004, on November 12, 2024 at 10:00 a.m., or as soon thereafter as counsel can be heard, for an order removing the debtors-in-possession pursuant to 11 U.S.C. § 1185(a), and for such other relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that any responses to the motion shall be filed with the Court and served upon undersigned counsel for MEP, the U.S. Trustee, the Subchapter V Trustee, and their respective counsel (if any), no later than seven (7) days prior to the return date.

¹ The debtors in these Chapter 11 cases are 4D Factory Inc. and The 4D Factory LLC.

Dated: October 9, 2024

REITLER KAILAS & ROSENBLATT LLP
Attorneys for MEP Capital Holdings III, L.P.

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